

REMARKSClaim rejection 35 USC § 112

Examiner has rejected claims 2 to 6 under 35 USC §112 and has then provided reasoning for rejections to claim 2, claim 4 (which applicants presume should be claim 5), claim 9 and claim 4. The amended claims accompanying this response address the matters raised in relation to claims 2, 4, 5 and 9.

In relation to claim 5, the term "the ATM cell boundary" has been replaced by "the start of an ATM cell" and an ATM network carrying ATM cells has been properly introduced in claim 4.

In relation to the rejection to the use of "AAL0" in claim 4 and the Examiner's assertion that this does not exist according to ATM standards, applicants can assure the Examiner that AAL0 does exist and relates to using the full 48 bytes of the ATM payload to carry data. This is explained in the specification at page 6, lines 20 to 22 and, in further support of this, applicants submit the first two pages of an online protocol directory which provides the same definition of AAL0. This material can be viewed at <http://www.protocols.com/pbook/atmsar.htm>.

Applicants have also taken the opportunity to bring the use of "virtual circuit" and "virtual channel" in the claims (claims 1, 6, 9, 11) into conformance with the description.

Claim rejections - 35 USC § 102

Claims 1, 4 to 7 and 11 are rejected under 35 USC § 102(e) as being anticipated by Won.

This rejection is respectfully traversed in view of the cancellation of claim 1. It is noted that claims 4 to 7 are dependent upon a separate independent claim 2 (and not claim 1) and similarly claim 11 is dependent upon a separate independent claim 9. As Won does not show the features, inter alia, of generating pointers identifying phase of the TDM traffic and mapping pointers into asynchronous cells for transport a head of traffic cells, claims 2, 9 and those claims dependent upon claims 2 and 9 (i.e. claims 3 to 8 and 10 to 15) are NOT anticipated by or obvious over Won.

Claim rejections 35 USC § 103

Claims 2 to 3 and 8 to 10 stand rejected under 35 USC § 103(a) as being obvious over Won and Irwin.

Applicants agree with the Examiner's reasoning in relation to the features not shown by Won. However, applicants do not agree with the Examiner's reasoning in relation to how Irwin teaches the features missing from Won.

Referring to figure 5 of Irwin, cells are received 415 and buffered 460 and the contents of cells are stored in a DS0 time slot interchange function (TSIC) 420 which stores a complete 125 microsecond frame of information. Data is read from the TSIC 420 and packaged into cells for onward transport. It should be noted that, in Irwin, traffic is already carried in the form of cells, albeit cells which are transported using an underlying SONET frame format. Irwin does not address the problem of coping with streams of TDM traffic which are offset in phase from one another (due to network timing differences) and thus does not disclose the step of generating pointers identifying the phase of the TDM traffic. Irwin also fails to disclose the feature of mapping pointers into one or more separate asynchronous cells for

transport ahead of the traffic cells. Applicants note the Examiner's comments in section 6 of the action (page 4, final 2 lines to page 5, line 2) and the passage of Irwin referred to (column 3, lines 31 to 34) but do not understand how this shows the feature of mapping pointers into one or more separate asynchronous cells for transport ahead of traffic cells.

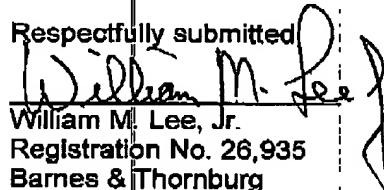
In summary, since Irwin fails to teach the features missing from Won, even if one of ordinary skill in the art were to combine Won with Irwin, he would not arrive at a method having all of the limitations set forth in claim 2. Thus, claim 2 must be non-obvious. For the same reasons, the subject matter of apparatus claim 9 is non-obvious.

Dependent claims 3 to 6 and 10 to 15 are considered to be patentable at least by virtue of their dependency on claims 2 or 9.

For the foregoing reasons, applicants respectfully submit that the claims in this application are in condition for allowance. Early issuance of a Notice of Allowance is solicited.

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